

Before the  
Federal Communications Commission  
Washington D.C. 20554

EX PARTE COMMENTS OF COMMUNICATION ACCESS CENTER FOR THE  
DEAF AND HARD OF HEARING, INC.  
ON  
ASSIGNING INTERNET PROTOCOL BASED TELECOMMUNICATIONS RELAY  
SERVICE USERS 10 DIGIT TELEPHONE NUMBERS LINKED TO THE NORTH  
AMERICAN NUMBERING PLAN

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## SUMMARY

Communications Access Center for the Deaf and Hard of Hearing, Inc. (CAC) urges the FCC to consider all aspects of the numbering proposals that have been submitted by various Video Relay Service (VRS) providers. Any numbering solution should address all forms of relay not just VRS. The ADA mandates an equal system to Deaf and Hard of Hearing users of the American telephone system, not a separate and equal. In designing a 10 digit system we need to ensure that both fixed and mobile end user equipment is considered. Relay and non-relay calls need to be accounted for, an example is a deaf text user of this system calling a deaf video user. They should not need to know that the other user is deaf and that they could use similar devices to call each other. They should only have to dial the 10 digit number. There is additional work being done on the 911 system for Deaf and Hard of Hearing, but the mobile communications has not been addressed. Work in the 10 digit number and the 911 have overlapping issues that need to be addressed, CAC advises combining these two initiatives into a consolidated plan.

A neutral 3<sup>rd</sup> party database as outlined in the ATIS report and in CSDVRS's reply comments is the best course. While we agree in basics with both ATIS and CSDVRS on portions of their respective comments there are areas of concern in both. The database should be open to all relay providers and should be directly accessible by the end user communications devices without the need to access their or any relay provider for direct calling. There are arguments against allowing public access to

this database, these arguments range from slamming to denial of service attacks, yet there are public accessible internet databases that do not suffer from these attacks. An example would be the root domain “.com”.

The ATIS report and CSDVRS recommend using a 10 digit to DNS type of database; this seems to be reasonable and supportable. The database could be used by many of the current devices already in the end users possession and access as they do today through LDAP protocol. New devices could use this method or newer methods as needed. One only needs the 10 digit number, a method to access the database, than be returned the connection information in the form of a DNS name or URI. CAC disagrees with Go America’s suggestion that CSDVRS’s comments should be rejected. While we don’t agree on all parts of the CSDVRS proposal, neither do we agree with all parts of any of the proposals set forth at this time. We believe that there is merit in everyone’s comments and each should be measured until all can agree on the best course of action.

In the Matter of )  
 )  
Telecommunications Services ) CC Docket No. 03-123  
For Individuals with Hearing and Speech )  
Disabilities, and the Americans with )  
Disabilities Act )  
 )

## I. Introduction and Background

CAC has been providing VRS since 2000 and IP Relay since 2006. CAC urges the FCC to consider that any numbering solution should address all forms of relay not just VRS. The ADA mandates an equal system to Deaf and Hard of Hearing users of the American telephone system, not a separate and equal.

## **II. RECOMMENDATIONS**

### **NUMBER ASSIGNMENT**

CAC recommends that Telecommunication Relay Service (TRS) users have primary responsibility for procuring numbers from their LEC (or alternative LEC, VoIP Provider, etc). While the Relay Providers could facilitate this process to whatever extent they deem appropriate, a direct relationship between the LEC and TRS User offers a number of benefits.

- The TRS user can be directory listed. (Of course they will be accurately listed for Emergency Purposes as well.)
- The TRS User will begin an ongoing relationship with the number provider.
- Ownership is placed on the TRS user to release numbers back to the LEC rather than simply abandon an unneeded number. This ensures that number assignments will not grow without bound over time which would cause additional stress on overall NANP number availability and TRS program funding.
- Universal number availability is guaranteed from any specific NANP locality as fast as possible, since numbers will be taken from actual LEC allocations.

- TRS Users will be able to take advantage of numbers they already have, but cannot use, like that on a SideKick or other mobile data device.

In order for this type of system to work, the FCC may be required to support special LEC pricing or tariffs for these customers.

Numbers assigned to hearing parties should also be eligible to use services which they can support. For example, hearing relatives of Deaf/HOH individuals often have Video Phones for making direct calls to their Deaf/HOH relative. It is appropriate to include the phone numbers of these users in the capability to place peer-to-peer calls via the ten-digit numbering plan.

## **INBOUND CALL DELIVERY**

There will need to be multiple call delivery methods available to support every locality within the NANP.

- Rate centers from more populous areas can easily be connected directly to any provider via either VoIP or wireline trunks.
- Smaller rate centers in rural areas, or areas served by independent telephone companies which are not served by these kinds of connections would be more efficiently served by RCF (Remote Call Forward).

- Not all LEC COs support RCF, so other call forwarding mechanisms would need to be supported.

### III. CONCLUSION

Communications Access Center for the Deaf and Hard of Hearing, Inc. (CAC) urges the FCC to consider all aspects of the numbering proposals that have been submitted by various Video Relay Service (VRS) providers. Any numbering solution should address all forms of relay not just VRS. The ADA mandates an equal system to Deaf and Hard of Hearing users of the American telephone system, not a separate and equal system. In designing a 10 digit system we need to ensure that both fixed and mobile end user equipment is considered.

A neutral 3<sup>rd</sup> party database as outlined in the ATIS report and in CSDVRS's reply comments is the best course. The database should be open to all relay providers and should be directly accessible by the end user communications devices without the need to access their or any relay provider for direct calling. The ATIS report and CSDVRS recommend using a 10 digit to DNS type of database; this seems to be reasonable and supportable. The database could be used by many of the current devices already in the end users possession and access as they do today through LDAP protocol.



CAC disagrees with Go America's suggestion that CSDVRS's comments should be rejected. While we don't agree on all parts of the CSDVRS proposal, neither do we agree with all parts of any of the proposals set forth at this time. We believe that there is merit in everyone's comments and each should be measured until all can agree on the best course of action.

Respectfully submitted,

/s/

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